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January 15, 1980

Ms. Teresa Dougherty
State of Michigan
Department of Natural Resources
Water Quality Division
Groundwater Compliance and
Special Studies Section
P. O. Box 30028
Lansing, Michigan 48909

SUBJECT: Completion of "Zero Discharge System"
Request to Rescind Hi-Mill's State Discharge
NPDES Permit No. 0039047 dated April 1, 1977.

Dear Ms. Dougherty:

As of December 21, 1979 the Hi-Mill Manufacturing Company has ceased discharging any process water from the plant to the lagoon.

We have been able to decrease amount of water use by judicious conservation and eliminate the discharges by recycling water when possible after treatment and filtration. Waste acids are neutralized in the tanks by the addition of 50% sodium hydroxide solution and measuring the pH until it is neutral (pH7). The tank is then pumped into the 2000 gallon storage tank to await hauling away by a licensed hauler, approved by the State of Michigan, for the disposal of this material. Brazing water is recycled from its storage tank until it becomes too concentrated. This material is between pH 6.5 and 6.8 so the waste hauler takes it in this condition for further treatment and ultimate disposal.

Oily waste water is treated in an Atcon oil water separator which works on the inclined plate principle. The difference in specific gravity causes the oil to agglomerate and rise and flows into an oil storage container. Oil is reused in other areas.

The compressor cooling water is now recycled after running through a water cooler.

The large outdoor, concentrated nitric acid tank has been removed and all acids are handled in carboy containers stored in an area that has a spill retaining wall around it.

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All items in the PIPP plan have been taken care of.

We have always been concerned about pollution and are constantly on our vigilance to prevent problems.

Thank you for your assistance in this matter. Should there be any questions, please do not hesitate to call Bruno Zane, Atcon Corporation, at 313-334-2464. If a plant tour is necessary, please call first so that we can arrange the time so our engineering people will be on hand to answer any technical questions.

Very truly yours,
HI-MILL MANUFACTURING COMPANY

Robert F. Beard, President

RFB:dmp

cc: Mr. Schrameck
Mr. Zollner
Mr. Zane